

July 22, 2003

Mr. Mike Van Houten
Plant Manager
Cargill Dry Corn Ingredients, Inc.
1730 West Michigan Street
Indianapolis, IN. 46222-3898

Re: 097-17839-00020
First Administrative Amendment to
Part 70 Operating Permit 097-5458-00020

Dear Mr. Van Houten:

Cargill Dry Corn Ingredients, Inc. was issued its initial Part 70 Operating Permit on March 17, 2003 for a grain storage, handling and milling operation under a Standard Industrial Classification (SIC) Code of 2041 (Corn Handling and Processing). A letter requesting a change to the specified normal operating pressure drop range for all baghouses stated in Condition D.2.5, D.7.4 and D.8.5 entitled Parametric Monitoring was received by the City of Indianapolis Office of Environmental Services (OES) on June 13, 2003.

Specifically, Cargill requested that the normal pressure drop operating range be changed from "3.0 and 6.0 inches of water" to "2.0 to 8.0 inches of water." Based on past and current operating experience, Cargill has noted and submitted that when filter bags are first replaced, the normal operating range is as low as 2.0 inches of water until a filter cake is established. Cargill has also noted that the normal operating range for these baghouses is up to 8.0 inches of water when a filter cake has been well established over time. Currently required visible emissions observations have not noted an opacity problem from these baghouses and if the pressure differential averages are outside of the revised range, Cargill will implement the steps in the Compliance Response Plan (CRP) to return the baghouse(s) to the revised operating range of "2.0 to 8.0" inches of water.

Cargill also requested that quarterly cyclone and baghouse inspection Conditions be revised to state semi-annual or annual inspections. Cargill stated that existing once per shift visible emissions notations and parametric monitoring conditions should already be able to detect potential problems with these control devices. 326 IAC 2-7-5(3) (Part 70 Permit Program: Permit Content) requires all permitted sources to demonstrate that all emitting units are in continuous compliance with all "applicable requirements" as defined by 326 IAC 2-7-1(6) (Part 70 Permit Program). Compliance is demonstrated by taking sufficient measurements of emissions or operating parameters or by gathering other data and should be sufficient to allow for optimization of the control technology used to achieve ongoing compliance with emission limitations or standards. The requirement of quarterly cyclone and baghouse inspections for Cargill is consistent with Part 70 Operating Permit conditions for significant emission units emitting particulate matter in the State of Indiana. Therefore, the quarterly cyclone and baghouse inspection Condition(s) is not amended.

Pursuant to the provisions of 326 IAC 2-7-11 the permit is hereby administratively amended as follows (deletions are in ~~strikeout~~ and additions are in **boldface type**):

1. The requested change in normal operating range for baghouse pressure drop causes a change in the Section D Compliance Monitoring Requirements, Parametric Monitoring Condition D.2.5, D.7.4 and D.8.5. Each of these three identical Conditions is amended as shown below with Condition D.2.5 displayed as the example amendment.

D.2.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the grain receiving operations, at least once per shift when grain receiving is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of ~~3.0 and 6.0~~ **2.0 to 8.0** inches of water or a range established during the latest stack test, the Permittee shall reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES shall be calibrated at least once every six (6) months.

All other conditions of the Part 70 Operating Permit shall remain unchanged and in effect. Please attach a copy of this First Administrative Amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mr. Mark Caraher at (317) 327-2234.

Sincerely,

Original signed by John B. Chavez

John B. Chavez
Administrator

Attachments-Replacement Permit pages
MBC

cc: File
Matt Mosier, OES
Mindy Hahn, IDEM OAQ

PART 70 OPERATING PERMIT

INDIANA DEPARTMENT of ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

and

CITY of INDIANAPOLIS OFFICE of ENVIRONMENTAL SERVICES

Cargill Dry Corn Ingredients, Inc.
1730 West Michigan Street
Indianapolis, Indiana 46222-3898

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17 and the Code of Indianapolis and Marion County, Chapter 511.

Operation Permit No.: T097-5458-00020	
Issued by: Original Signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 17, 2003
Original Signed by John B. Chavez Administrator, OES	Expiration Date: March 17, 2008
First Administrative Amendment:: 097-17839-00020	Pages Affected: 1, 34, 47 & 50
Original Signed by John B. Chavez Administrator, OES	Issuance Date: July 22, 2003

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Visible Emissions Notations

- (a) Visible emission notations of Stack/Vent 8 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the grain receiving operations, at least once per shift when grain receiving is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 to 8.0 inches of water or a range established during the latest stack test, the Permittee shall reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES shall be calibrated at least once every six (6) months.

D.2.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling D-20 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.7.4 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with D-21, D-22, D-23, D-24, D-25, D-26, D-30, D-31 and D-37, at least once per shift when in operation and when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 to 8.0 inches of water or a range established during the latest stack test, the Permittee shall reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES shall be calibrated at least once every six (6) months.

D.7.5 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling D-21, D-22, D-23, D-24, D-25, D-26, D-30, D-31 and D-37 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.7.6 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

than fifteen (15) tons per twelve consecutive month period with compliance determined at the end of each month.

The baghouses for Particulate Matter (PM) and PM10 control shall be in operation at all times D-50 and D-52 are in operation in order to comply with the PM and PM10 limits. Therefore, these conditions limit the potential to emit of PM to less than twenty five (25) tons per year and limit PM10 to less than fifteen (15) tons per year such that 326 IAC 2-2 does not apply.

D.8.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID D-50 and D-52 and any control devices.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.8.4 Visible Emissions Notations

- (a) Visible emission notations of Stack/Vent D-50 and Stack/Vent D-52 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.8.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with Emission Unit ID D-50 and D-52 operations, at least once per shift when in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 to 8.0 inches of water or a range established during the latest stack test, the Permittee shall reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES shall be calibrated at least once every six (6) months.

D.8.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling D-50 and D-52 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.